IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JOSEPH THOMAS

Plaintiff,

C.A. NO: 02-CV-4586

V.

TRANS UNION LLC and CINGULAR WIRELESS

Defendant.

TRANS UNION LLC'S MOTION FOR SUMMARY JUDGMENT

Trans Union LLC ("Trans Union"), by and through its undersigned attorneys, moves this Court, pursuant to Federal Rule of Civil Procedure 56, for summary judgment. Trans Union is entitled to summary judgment because there is no issue of material fact and Trans Union is entitled to judgment as a matter of law. The reasons and authorities for this motion are set forth more fully in the attached Statement of Undisputed Facts, Memorandum of Law in Support of Motion for Summary Judgment, and exhibits thereto.

Respectfully Submitted,

SATZBERG, TRICHON, KOGAN & WERTHEIMER, P.C.

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DATED: March 27, 2003